

Linda A. Harvey
 Robert R. Thomas
 Harvey, Kleger & Thomas
 184 Pleasant Valley St. – Suite 1-204
 Methuen, MA 01844
 (978) 686-9800
 Attorneys for Plaintiff
 Luann Gould

UNITED STATES DISTRICT COURT
 DISTRICT OF MASSACHUSETTS

-----	X	
Luann Gould,	:	
	:	
Plaintiff,	:	05 CV 11118 (PBS)
	:	
– against –	:	
	:	PLAINTIFF’S
Lucent Technologies, Inc.,	:	<u>PRE-TRIAL DISCLOSURE</u>
	:	
	:	
Defendant.	:	
-----	X	

Plaintiff Luann Gould (“Gould”), by her attorneys Harvey, Kleger & Thomas, hereby provide the automatic disclosures pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure. In making these disclosures, Luann Gould states that the disclosures are based on the information reasonably available to her at this time and are made without waiving any objections as to relevance, materiality, or admissibility of evidence in this action or any other action or proceeding.

(a) The name and, if not previously provided, the address and telephone number of each witness, separately identifying those whom the party expects to present and those whom the party may call if the need arises:

The Plaintiff expects to present the following witnesses:

1. Luann Gould, Plaintiff

14 Billy's Way, Danville, NH 03819
Tel. 603-382-3977

2. Dr. Thomas J. Cammilleri, Greater Hampstead Family Medicine, PC, 207 Stage Road, Hampstead, NH 03841. Tel. 603-329-5222.
3. Nicole May, Physician's Assistant, Greater Hampstead Family Medicine, PC, 207 Stage Road, Hampstead, NH 03841. Tel. 603-329-5222.
4. Pyong W. Deletis, Supervisor
c/o Lucent Technologies
5. Katherine A. Campbell, Workforce Relations Supervisor
c/o Lucent Technologies
6. Margaret L. Blumer, Authorized Benefit Delegate
c/o Lucent Technologies

The Plaintiff may call the following witnesses:

7. Gary Nilsson, President CWA Local 1365. Mr. Nilsson is available at 1627 Osgood St., PO Box 68, North Andover, MA 01845. Tel. 978-688-6038.
8. Brian Ahern, Supervisor, c/o Lucent Technologies, Inc.
9. Stephen Sickel, c/o Lucent Technologies, Inc.
10. Jan Denise, c/o Lucent Technologies, Inc.
11. Lee Pratt, c/o Lucent Technologies, Inc.
12. Mark Savelloni, c/o Lucent Technologies, Inc.

The Plaintiff reserves the right to supplement this list prior to trial with reasonable notice to the Defendant.

(b) The designation of those witnesses whose testimony is expected to be presented by means of a deposition and, if not taken stenographically, a transcript of the pertinent portions of the deposition testimony: none.

(c) An appropriate identification of each document or other exhibit, including summaries of other evidence, separately identifying those which the party expects to offer and those which the party may offer if the need arises.

The Plaintiff expects to offer the following documents or exhibits:

1. Emails from July, 2003 provided by Defendant (numbered DEF 00013-22).
2. Plaintiff's FMLA documents from 2003, including Leave of Absence Notification Forms.
3. Letter dated July 7, 2003 from Peggy Blumer to Luann Gould.
4. Letter dated July 9, 2003 from Nicole May, PA-C to Whom it May Concern.
5. Letter dated July 14, 2003 from Peggy Blumer to Luann Gould.
6. Letter dated July 28, 2003 from Peggy Blumer to Luann Gould.
7. The prescription medication (Erythromycin ointment) and the label for the prescription medication, dated July 7, 2003.
8. Letter dated September 18, 2003 from Kathy Richard, Hampstead Village Preschool, Inc. re: Shelby Gould's absences.
9. Merrimack Valley Works Absence Control Plan documents (numbered DEF 00052-56).
10. Letter dated August 1, 2003 from Steven Sickel to Gary Nilsson.
11. Miscellaneous letters from CMW Local 1365 regarding grievance or arbitration for Luann Gould.
12. Documents from the New Hampshire Division of Public Health Services regarding Chicken pox and shingles; and Conjunctivitis

The Plaintiff may offer the following documents or exhibits:

1. Any documents relating to Plaintiff's leaves of absence in 2003, suspension, probation, or termination provided as Exhibits or Attachments to Exhibits in Defendant's Motion for Summary Judgment.

2. Any documents marked as exhibits at the deposition of Plaintiff, Luann Gould.
3. Any documents marked as exhibits at the deposition of Pyong Deletis.
4. Any documents relating to Plaintiff's daughter's serious medical condition in May, 2003 and in July, 2003, as provided in discovery or as Exhibits or Attachments to Exhibits in Defendant's Motion for Summary Judgment.
5. Selections from the Merrimack Valley Works Absence Control Plan.
6. "Leaves of Absence" from the Lucent Personnel Guide.

The Plaintiff reserves the right to supplement this list prior to trial with reasonable notice to the Defendant.

Respectfully Submitted,

HARVEY, KLEGER & THOMAS

By: /s/ Robert R. Thomas

Linda A. Harvey (547994)
Robert R. Thomas (639402)
184 Pleasant Valley St. – Suite 1-204
Methuen, Massachusetts 01844
(978) 686-9800
Attorneys for Plaintiff Luann Gould

Dated: September 11, 2006